

Sylvia Bolos

From: Ian Lyngklip
Sent: Thursday, February 01, 2018 10:41 AM
To: Beth-Ann Krinsky; Sylvia Bolos
Cc: Baxter, David (dbaxter@gallaghersharp.com) (dbaxter@gallaghersharp.com); Eggum, John (jeggum@fgppr.com) (jeggum@fgppr.com)
Subject: RE: Keskitalo v. SunPath - revisions to stipulated protective order

Beth-Ann,

We do not wish to negotiate a PO providing protection for confidential documents only to find later that documents and information have been withheld due to confidentiality.

If you cannot anticipate the protections that you might need at this time, best to table the conversation until you have gotten your arms around that issue. We will delete any reference to the PO from the 26(f) report and take the issue up at a later date.

Best regards,

Ian

From: Beth-Ann Krinsky [mailto:beth-ann.krinsky@gmlaw.com]
Sent: Wednesday, January 31, 2018 4:17 PM
To: Sylvia Bolos <SylviaB@MichiganConsumerLaw.com>; Ian Lyngklip <ian@MichiganConsumerLaw.com>
Cc: Baxter, David (dbaxter@gallaghersharp.com) (dbaxter@gallaghersharp.com) <dbaxter@gallaghersharp.com>; Eggum, John (jeggum@fgppr.com) (jeggum@fgppr.com) <jeggum@fgppr.com>
Subject: RE: Keskitalo v. SunPath - revisions to stipulated protective order

Sylvia, I cannot agree to the additions you want to make to the first 2 pages. I can't predict the future and it is not appropriate for me to commit to agreeing that this is an adequate protection for all documents without knowing what may end up being at issue. I certainly will not ask for more protection unless it is necessary and I will confer with you should that need arise. The protective Order will speak for itself.

I am fine with your changes to Section 16 but I do not see what you rejected other than the changes you sought on the first 2 pages. Let me know where those rejections are in the redline.

I also think you need to add John Eggum's firm to the stipulation.

Please send me the final format so I can see it with those changes to Section 16 incorporated. Thank you.

GreenspoonMarder

Greenspoon Marder LLP

Beth-Ann E. Krinsky
Partner
200 E. Broward Boulevard

Suite 1800

Fort Lauderdale, FL 33301

Direct Phone: 954-527-2427

General Phone: 954-491-1120, ext. 2627

Fax: 954-333-4027

beth-ann.krimsky@gmlaw.com

From: Sylvia Bolos [<mailto:SylviaB@MichiganConsumerLaw.com>]

Sent: Wednesday, January 31, 2018 4:05 PM

To: Beth-Ann Krimsky; Ian Lyngklip

Cc: Baxter, David (dbaxter@gallaghersharp.com) (dbaxter@gallaghersharp.com); Eggum, John (jeggum@fgppr.com) (jeggum@fgppr.com)

Subject: RE: Keskitalo v. SunPath - revisions to stipulated protective order

Beth-Ann

Please see attached further redline. I agreed with striking some the language at the beginning but not all. We tendered a modified NDIL PO in the first place and mentioned that during yesterdays call. I think we would both agree that filing an unedited/unchanged NDIL PO won't make sense for either party either. I've accepted the vast majority of your changes, rejected some, and I have made a few other changes based on some of your changes, most of which I have explained with a note in the margin.

Please let me know if I have your consent to file this document. If you have further edits, please tender in redline again.

Thank you

Sylvia Bolos

From: Beth-Ann Krimsky [<mailto:beth-ann.krimsky@gmlaw.com>]

Sent: Wednesday, January 31, 2018 2:43 PM

To: Sylvia Bolos <SylviaB@MichiganConsumerLaw.com>; Ian Lyngklip <ian@MichiganConsumerLaw.com>

Cc: Baxter, David (dbaxter@gallaghersharp.com) (dbaxter@gallaghersharp.com) <dbaxter@gallaghersharp.com>; Eggum, John (jeggum@fgppr.com) (jeggum@fgppr.com) <jeggum@fgppr.com>

Subject: Keskitalo v. SunPath - revisions to stipulated protective order

Sylvia, Here are the requested changes on the protective order. I was able to send this one to you "unscrubbed" so you should be able to just accept the changes that I believe should be agreeable to you. The beginning portion is not in the model order from the Northern District of Illinois and I do not see the need to include it. I will address the joint report shortly.

Thanks.

Beth-Ann

GreenspoonMarder

Greenspoon Marder LLP

Beth-Ann E. Krinsky
Partner
200 E. Broward Boulevard
Suite 1800
Fort Lauderdale, FL 33301
Direct Phone: 954-527-2427
General Phone: 954-491-1120, ext. 2627
Fax: 954-333-4027
[**beth-ann.krinsky@gmlaw.com**](mailto:beth-ann.krinsky@gmlaw.com)

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